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Attorneys for Plaintiff JENNIFER SHULL

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JENNIFER SHULL

Plaintiff,

vs.

BOUTIQUE AIR, INC. a California Corporation,
OPEN TRIP, INC., a California Corporation, and
MARK HENDRIX, SHAWN SIMPSON, and
MICHAEL RECH, Individuals.

Defendants.

) CASE NO. 4:20-CV-08568-YGR
)
) **JOINT STIPULATION AND**
) **[PROPOSED] ORDER TO**
) **EXTEND TIME TO COMPLETE**
) **SETTLEMENT CONFERENCE**
) **(ADR L.R. 6-5; CIVIL L.R. 7-12)**
)
)
)
) Trial Date September 26, 2022

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1 TO THE HONORABLE COURT:

2 The parties hereto, Plaintiff JENNIFER SHULL (“Plaintiff”) and Defendants
3 BOUTIQUE AIR, INC., OPEN TRIP, INC., MARK HENDRIX, SHAWN SIMPSON, and
4 MICHAEL RECH (“Defendants”), by and through their respective counsel of record, hereby
5 stipulate as follows:

6 WHEREAS, Plaintiff and Defendants agreed to participate in a settlement conference
7 with a Magistrate Judge pursuant to ADR L.R. 6, and this Court referred the Action to a
8 settlement conference by Order dated March 29, 2021;

9 WHEREAS, the Parties’ current deadline to complete the settlement conference is
10 September 17, 2021;

11 WHEREAS, Magistrate Judge Alex G. Tse was assigned as the settlement conference
12 judge;

13 WHEREAS, after input from the Parties, Magistrate Judge Tse scheduled the matter for a
14 settlement conference for August 23, 2021 starting at 11:00 a.m.;

15 WHEREAS, due to scheduling conflicts, the Parties have been unable to schedule the
16 necessary depositions in order to assess the case for settlement;

17 WHEREAS, the scheduling conflicts are due to the flight schedule of the Parties and
18 witnesses (Plaintiff, several Defendants and one of the witnesses are Pilots and do not have a set
19 flight schedule) as well as pre-planned vacations, hearings and trials:

20 WHEREAS, due to the challenges involved with scheduling the necessary depositions,
21 the Parties will not be prepared to participate in a productive settlement conference by September
22 17, 2021 and request a thirty (30) day extension, up through October 15, 2021 to complete the
23 settlement conference;

24 WHEREAS, there has been no prior extension of time for the Parties to complete the
25 settlement conference;

26 WHEREAS, Plaintiff and Defendants do not anticipate that this extension of time will
27 alter the date of any event or any deadline already fixed by Court order.

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1 IT IS HEREBY STIPULATED by and between Plaintiff and Defendants through their
2 respective counsel of record that the deadline to complete the settlement conference is extended
3 up to October 15, 2021.

4 IT IS SO STIPULATED.

5 Dated: July 20, 2021

GUNDERSON EMPLOYMENT LAW

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8 By: /s/ Erik Gunderson
Erik Gunderson
9 Attorneys for Plaintiff
JENNIFER SHULL
10

11 Dated: July 20, 2021

THE DALTON LAW FIRM

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14 By: /s/ Alana G. I. Simmons
Alana G. I. Simmons
15 *Pro Hac Vice*
Attorneys for Plaintiff
16 JENNIFER SHULL
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18 Dated: July 20, 2021

GORDON REES SCULLY MANSUKHANI, LLP

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21 By: /s/ Azniv Darbinian
Mollie M. Burks
22 Azniv Darbinian
Attorneys for Defendants
23 BOUTIQUE AIR, INC., OPEN TRIP, INC.,
24 MARK HENDRIX, SHAWN SIMPSON,
AND MICHAEL RECH
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ATTESTATION OF E-FILED SIGNATURE

I, Azniv Darbinian, am the ECF user whose ID and password are being used to file this Joint Stipulation to Extend Time to Complete the Settlement Conference. In compliance with Local Rule 5-1(i), I hereby attest that Erik Gunderson and Alana Simmons, counsels for Plaintiff, have concurred in this filing.

Dated: July 20, 2021

/s/ Azniv Darbinian

Azniv Darbinian

Gordon Rees Scully Mansukhani, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the deadline for Plaintiff and Defendants to complete the settlement conference is extended to October 15, 2021.

Dated: _____, 2021

UNITED STATES DISTRICT JUDGE

59550111v.1

Gordon Rees Scully Mansukhani, LLP
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